



IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re Applicant:

Randolph E. Crutchfield

§

Art Unit: 2615

Serial No.: 10/045,524

§

Examiner: Xu Mei

Filed: November 7, 2001

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Atty Docket: ITL.0690US
P13221

For: Controlling a Digital Audio Player
From a Cassette Tape Player Adapter

§

Assignee: Intel Corporation

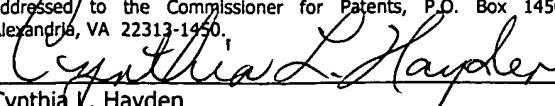
Mail Stop Appeal Brief-Patents
Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

REPLY BRIEF

This reply brief responds to the new points raised in the Examiner's Answer.

For the first time on appeal, the Examiner relies on the material in column 3, lines 54-56. This material indicates that the variable impedance switches upon which the Examiner relies are "for coupling the motor to that power source." The biased circuit varies the impedance on those switches "to limit the current supplied through such switches to the motor." Certainly, the Examiner cannot reasonably contend that the variable impedance switches are "to signal said state," said state being a received state. The only signal that is applied to the variable impedance switches is a signal which changes their impedance to control the motor operation.

There is nothing that reasonably can be called receiving one of at least two states, nor is there any signaling of such states by changing impedance. The suggestion that individual selection provides for different operation of the cassette player is unsupported except to the

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Cynthia L. Hayden

extent that the motor may be operated differently. But, certainly, no state is ever signaled by changing the impedance. The language of the claim clearly excludes the motor control operation asserted in the office action.

Therefore, the rejection of claim 32 should be reversed.

With respect to the rejection on claim 35, based on Osawa, for the first time on appeal, the Examiner attempts to point out the missing element of varying the impedance of a selectively variable impedance in a first device “to develop a state signal for a remote second device to indicate said selected state.” The analysis set forth on page 7 of the Answer is so strained on its face that little rebuttal may be needed, other than to urge a critical reading of the argument. To suggest that the on/off switch provides a state signal is not credible. The suggestion that impedance is varied “to develop a state signal on control signal S2 of 2.5 volts” is untenable. There is no state signaling. The operation of the impedance adjusting circuit 11 is never explained, nor can the Examiner possibly render a reasonably persuasive argument that this undefined circuit somehow has its impedance change to signal one of at least two states.

The Examiner attempts to argue states are signaled because the impedance circuit must, presumably, be either on or off. But, most certainly, there is no need to use an impedance circuit to indicate whether something is on or off, nor are on and off conventionally considered to be states. “On” might be a state, but “off” is the absence of a state.

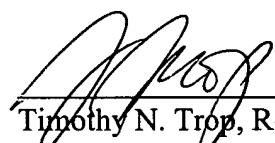
The Examiner claims that two variable resistors RV1 and RV2 are recited. Of course, the problem is that they have nothing to do with the variable impedance circuit 11. Instead, they are part of the control signal processing circuit 10. The rejection is utterly baseless and should be reversed.

In paragraph 36, the Examiner attempts to show that a circuit whose operation is unexplained somehow translates a cassette player command by varying the impedance of a selectively variable impedance. There is absolutely no basis for the argument set forth on the top of page 8.

With respect to the rejection based on Adams, the Examiner's arguments fail to address, for example, dependent claim 41.

Respectfully submitted,

Date: December 13, 2006



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